

**United States Environmental Protection Agency  
Region VIII  
POLLUTION REPORT**

SDMS Document ID



2031544

**ADMINISTRATIVE  
RECORD**

**Date:** Friday, October 07, 2005  
**From:** Craig Myers, OSC  
**To:** Eugene Lee, EPA Headquarters  
**Subject:** Final POLREP  
 Libby Asbestos - Stimson Mill  
 60 Port Blvd, Libby, MT  
 Latitude: 48.3796  
 Longitude: -115.54631

<b>POLREP No.:</b>	12	<b>Site #:</b>	08BCRV05
<b>Reporting Period:</b>		<b>D.O. #:</b>	072-08-012
<b>Start Date:</b>	5/1/2005	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	5/1/2005	<b>Response Type:</b>	Time-Critical
<b>Completion Date:</b>	10/5/2005	<b>NPL Status:</b>	NPL
<b>CERCLIS ID #:</b>	MT0009083840	<b>Incident Category:</b>	Removal Action
<b>RCRIS ID #:</b>		<b>Contract #</b>	68-W-02-072

#### Site Description

The Libby Asbestos Site includes an inactive vermiculite mine located in northwestern Montana. Vermiculite mining at Zonolite Mountain (the "mine") was commenced by the Universal Zonolite Company in the 1920s. In 1963, W.R. Grace acquired the property and continued operations until September, 1990.

The processed ore was trucked down the Rainy Creek Road to a Screening Plant, which separated the milled ore into several sizes. Subsequently, the screened ore was moved by conveyor belt across the Kootenai River and shipped either to the Export/Expansion Plant in Libby for further processing or across the country by rail.

This POLREP details only a portion of OU 05 - the "Former Stimson Central Maintenance Building" (CMB). The Stimson property housed vermiculite processing operations until 1950. After that, the Stimson Lumber Mill began producing plywood and dimensioned lumber, continuing to do so until 2002. Buildings around the property contain varying amounts of vermiculite. The property is now owned and operated by the Lincoln County Port Authority, a non-profit portion of the county government that was established to coordinate and oversee economic redevelopment in Libby.

#### Current Activities

##### Preliminary Assessment/Site Inspection Results:

Within the CMB, three distinct areas have been identified that have Vermiculite Containing Insulation (VCI) or other asbestos containing building materials that are causing a human health threat or threatening a release to the environment. These areas are the Midline Wall (believed to

have once been an exterior wall), the former Mobile Shop, and the former Mobile Shop roof. VCI has been observed leaking from all sections of the Midline Wall, and all walls of the Former Mobile Shop. The Former Mobile Shop roof was constructed of a tongue and groove decking material and covered with a light concrete type material. EPA believes that vermiculite was mixed in with this concrete as aggregate. The concrete was sampled and tested out at less than 1% Libby Amphibole. However, the concrete material is damaged to the point that it cannot be repaired. Future removal or repair, due to the structure's age rather than contamination, will threaten the remedy planned for the interior of the mobile shop.

Portions of the lower roof areas are of similar construction as the former Mobile Shop roof, but are undamaged. Future removal or repair will not pose a threat to the remedy inside the building.

All current actions have been completed at this time. Due to the construction of the CMB, it is impossible to determine if the wall cavities are 100% free of vermiculite. Any remaining vermiculite will likely be contained in seams of the moisture barrier, however, it is encapsulated and sealed within the wall cavities. Sampling conducted during and after cleanup indicated that the CMB met standards similar to those EPA has established for cleanup of homes and businesses in Libby. Due to the unique and large nature of the building and cleanup, and the fact that EPA has not yet published a ROD for the Libby Asbestos Site, additional evaluations may be necessary to determine the long-term efficacy and protectiveness of the cleanup. Under current conditions, EPA considers the CMB acceptable for occupation and use.

#### Planned Removal Actions

There are no further planned time critical removal actions in Operable Unit 5 of the Libby Asbestos NPL site at this time.

#### Next Steps

EPA will draft a letter to the Lincoln County Port Authority (LCPA) stating that tenants may now occupy the building. This letter will also state that the former CMB was not cleaned to demolition standards, and therefore may not be demolished without further sampling and clean up as appropriate.

#### Key Issues

LCPA shall work with MDEQ to develop and adhere to an asbestos management plan as required by AHERA as well as follow any other appropriate or relevant and applicable regulations governing any contamination that was left in place. Also, the wall surface material, tongue and groove planking, is still considered contaminated material because it is a non-cleanable surface that was in direct contact with vermiculite insulation. Therefore, it must be disposed of properly if removed from the building.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$900,000.00	\$870,426.46	\$29,573.54	3.29%
IAGs	\$35,000.00	\$20,000.00	\$15,000.00	42.86%
<b>Intramural Costs</b>				

<b>Total Site Costs</b>	\$935,000.00	\$890,426.46	\$44,573.54	4.77%
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\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

[www.epaossc.org/LibbyStimson](http://www.epaossc.org/LibbyStimson)